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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARIA DOLORES MORALES BECERRA,
individually; CLARISSA BECERRA,
individually; RAYNA BECERRA,
individually; and RICHARD BECERRA, IN
HIS CAPACITY AS SPECIAL
ADMINISTRATOR FOR THE ESTATE OF
RAYMOND BECERRA, DECEASED:

Case No.: 2:21-cv-02094-JCM-NJK

**JOINT MOTION TO EXTEND STAY OF
DEADLINES
[THIRD REQUEST]**

Plaintiffs,

VS.

WALMART INC., a foreign business entity
dba WALMART; DOE INDIVIDUALS 1-10;
and ROE ENTITIES I-X, inclusive.

Defendants.

Plaintiffs MARIA DOLORES MORALES BECERRA, CLARISSA BECERRA, RAYNA BECERRA, and RICHARD BECERRA, IN HIS CAPACITY AS SPECIAL ADMINISTRATOR FOR THE STATE OF RAYMOND BECERRA (hereinafter "Plaintiffs")

1 and Defendant WALMART INC. d/b/a WALMART (hereinafter "Defendant" or "Walmart"), by
2 and through their respective counsel of record, do hereby jointly move the Court, in light of the
3 Parties' settlement in principle of this matter, to stay all deadlines for an additional thirty (30)
4 days to finalize resolution of all matters in controversy in the above-referenced matter.

5 This is the third such request by either party to extend or modify the schedule. Good cause
6 exists because all matters in controversy between the Parties have been settled. The Parties have
7 exchanged settlement documents. Plaintiffs have signed the settlement and release agreements,
8 and Defendant has ordered the settlement checks. The Parties are now waiting for the settlement
9 checks to arrive so that they can be exchanged for the signed releases and the case can be
10 dismissed. The Parties believe that entry of a temporary stay will promote judicial economy and
11 preserve the Court's resources. Accordingly, the Parties respectfully request a 30-day stay for the
12 above-referenced action, including any hearings or deadlines, through July 19, 2022.

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1 Wherefore, the Parties respectfully request that the Court enter an order staying all
2 deadlines in this matter for thirty (30) days, through July 19, 2022, with the parties to either file
3 a dismissal of all claims or alternatively to file a status report with the Court within 30 days of
4 the Court's order entering the stay.

5 DATED this 17th day of June, 2022.

6 **BAY LAW PERSONAL INJURY**

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8 _____
9 /s/ Christian A. Miles
10 CHRISTIAN A. MILES, ESQ.
11 Nevada Bar No. 13193
12 1540 W. Warm Springs Rd., Ste. 110
13 Henderson, NV 89014
14 *Attorneys for Plaintiffs*

5 DATED this 17th day of June, 2022.

6 **ALVERSON TAYLOR & SANDERS**

7
8 _____
9 /s/ Patrice Stephenson-Johnson
10 PATRICE STEPHENSON-JOHNSON, ESQ.
11 Nevada Bar No. 12283
12 6605 Grand Montecito Pkwy, Ste. 200
13 Las Vegas, NV 89149
14 *Attorneys for Defendant*

15
16 **IT IS SO ORDERED:**

17
18 DATED: June 23, 2022

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20 _____
21 *James C. Mahan*

22 UNITED STATES DISTRICT JUDGE



CERTIFICATE OF SERVICE

Pursuant to FRCP Rule 5, I hereby certify that I am an employee of the law firm BAY LAW PERSONAL INJURY, and that on this 17th day of June, 2022, I electronically served a copy of **JOINT MOTION TO EXTEND STAY OF DEADLINES [THIRD REQUEST]** as follows:

- By facsimile addressed to the following counsel of record, at the address listed below;
- By placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- By Hand Delivery (ROC); and/or
- By Electronic Service through CM/ECF to:

PATRICE STEPHENSON-JOHNSON, ESQ.
Nevada Bar No. 12283
ALVERSON TAYLOR & SANDERS
6605 Grand Montecito Pkwy, Ste. 200
Las Vegas, NV 89149
Attorneys for Defendant

/s/ Christian A. Miles
An employee of Bay Law Personal Injury

Subject: RE: Becerra SAO to Stay
Date: Friday, June 17, 2022 at 11:08:35 AM Pacific Daylight Time
From: Patrice Stephenson-Johnson
To: Christian Miles
CC: Nihat Deniz Bayramoglu, Bhuvanesh Prembabu
Attachments: image001.png

Hi Christian,

You may affix my e-signature.

Best regards,

Patrice Stephenson-Johnson |
Alverson Taylor & Sanders
702.384.7000 | alversontaylor.com

From: Christian Miles <christian@baylawinjury.com>
Sent: Friday, June 17, 2022 10:02 AM
To: Patrice Stephenson-Johnson <PStephenson@AlversonTaylor.com>
Cc: Nihat Deniz Bayramoglu <deniz@baylawinjury.com>; Bhuvanesh Prembabu <bhuvan@baylawinjury.com>
Subject: Becerra SAO to Stay

Good Morning Patrice,

Our stay in Federal Court expires this coming Monday in the Becerra case. Attached to this email is a proposed Motion to Extend Stay to give us time for the settlement checks to come in and to exchange documents. Please let me know if I can submit the Motion using your electronic signature.

Best Regards,

**CHRISTIAN
MILES** 
Personal Injury Attorney

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MAKE THEM
PAY WITH
BAY

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